Exhibit List for Plaintiffs' Motion to Compel Further Responses to Plaintiffs' Set II Written Discovery

Exhibit A

REQUEST FOR ADMISSION NO. 1:
YOU believe there is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for every "serious side effect" identified in the Medication Guide for BYETTA.

REQUEST FOR ADMISSION NO. 2:
YOU do not believe there is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for every "serious side effect" identified in the Medication Guide for BYETTA.

REQUEST FOR ADMISSION NO. 3:
YOU believe there is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for every medical condition identified in the Highlights, Warnings and Precautions, Adverse Reactions, Nonclinical Toxicology, Clinical Studies, Patient Counseling Information, and Medication Guide for BYETTA.

REQUEST FOR ADMISSION NO. 4:
YOU do not believe there is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for every medical condition identified in the Highlights, Warnings and Precautions, Adverse Reactions, Nonclinical Toxicology, Clinical Studies, Patient Counseling Information, and Medication Guide for BYETTA.

REQUEST FOR ADMISSION NO. 5:
YOU believe there is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for every "serious side effect" identified in the Medication Guide for every branded prescription drug YOU sell.

REQUEST FOR ADMISSION NO. 6:
YOU do not believe there is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for every "serious side effect" identified in the Medication Guide for every branded prescription drug YOU sell.

REQUEST FOR ADMISSION NO. 7:
YOU believe there is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for every medical condition identified in the Highlights, Warnings and Precautions, Adverse Reactions, Nonclinical Toxicology Clinical Studies, Patient Counseling Information, and Medication Guide for every branded prescription drug YOU sell.

REQUEST FOR ADMISSION NO. 8:
YOU do not believe there is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for every medical condition identified in the Highlights, Warnings and Precautions, Adverse Reactions, Nonclinical Toxicology, Clinical Studies, Patient Counseling Information, and Medication Guide for every branded prescription drug YOU sell.

REQUEST FOR ADMISSION NO. 9:
To the best of YOUR knowledge, the FDA has never allowed a branded prescription drug to reference a medical condition for which there is no REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION.

REQUEST FOR ADMISSION NO. 10:
There is REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION between BYETTA use and pancreatitis.

REQUEST FOR ADMISSION NO. 11:
There is no REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION between BYETTA use and pancreatitis.

REQUEST FOR ADMISSION NO. 30:
YOU are in discussions with the FDA about adding a warning for all cancers to the label for BYETTA.

REQUEST FOR ADMISSION NO. 31:
YOU are not in discussions with the FDA about adding a warning for all cancers to the label for BYETTA.

REQUEST FOR ADMISSION NO. 32:
YOU are in discussions with the EMA about adding a warning for all cancers to the label for BYETTA.

REQUEST FOR ADMISSION NO. 33:
YOU are not in discussions with the EMA about adding a warning for all cancers to the label for BYETTA.

REQUEST FOR ADMISSION NO. 34:
YOU are in discussions with regulatory bodies outside the United States about adding a warning for pancreatic cancer to the label for BYETTA.

REQUEST FOR ADMISSION NO. 35:
YOU are not in discussions with regulatory bodies outside the United States about adding a warning for pancreatic cancer to the label for BYETTA.

REQUEST FOR ADMISSION NO. 36:
YOU are in discussions with regulatory bodies outside the United States about adding a warning for all cancers to the label for BYETTA.

REQUEST FOR ADMISSION NO. 37:
YOU are not in discussions with regulatory bodies outside the United States about adding a warning for all cancers to the label for BYETTA.

INTERROGATORY NO. 2:
Describe the REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION for each "serious side effect" identified in the Medication Guide for BYETTA.

INTERROGATORY NO. 3:
In the past 8 years, have YOU ever submitted to the FDA a LABEL SUBMISSION that included a request for a "serious side effect" to be identified in the Medication Guide for one of YOUR branded prescription drugs, when YOU did not believe there was REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION between the "serious side effect" and YOUR drug? If so, identify each such LABEL SUBMISSION, and explain why you made each such LABEL SUBMISSION.

INTERROGATORY NO. 4:
In the past 8 years, has the FDA ever required a warning for a "serious side effect" to be identified in the Medication Guide of one of YOUR branded prescription drugs for which YOU did not believe there was REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION between the "serious side effect" and YOUR drug? If so, identify each such drug and required warning, and identify all communications YOU had with the FDA regarding each such drug and required warning.

INTERROGATORY NO. 5:
In the past 8 years, has the FDA refused a warning YOU proposed be added to the label of one of YOUR branded prescription drugs to address a serious side effect" in the drug's Medication Guide because, in the FDA's view, there was no REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION between the "serious side effect" and YOUR drug? If so, identify each such drug and refused

warning, and identify all communications YOU had with the FDA regarding each such drug and refused warning.

INTERROGATORY NO. 6:

If any regulatory body has requested and/or required that YOU change the label for BYETTA to add or strengthen warnings about the risks of pancreatitis, pancreatic cancer and/or all cancers that are or may be associated with the use of BYETTA, state the date on which each such label change was requested and/or required; identify and describe all oral and/or written communications YOU have had with the regulatory body regarding each such requested and/or required label change; identify all DOCUMENTS articulating the scientific basis for each such requested and/or required label change; state the date of implementation for each such requested and/or required label change that has been implemented; and explain the current status of each such requested and/or required label change that has not been implemented (e.g., still under consideration, request or requirement withdrawn; request or requirement stayed; etc).

INTERROGATORY NO. 7:

If YOU and/or any of YOUR employees have been or are under investigation by any governmental entity or entities for any allegedly criminal and/or civil activity or other allegedly wrongful conduct with respect to BYETTA, including without limitation fraud, misrepresentation (including but without limitation, manipulation of any preclinical, nonclinical, animal, clinical, and/or post-clinical study participant selection criteria, protocols, processes, data, and/or results) and/or bribery, identify the governmental entity or entities involved; identify the person(s) you understand to be in charge of each investigation; state the reason(s) for each such investigation as you understand them; state the date on which each such investigation started; describe the current status of each such investigation; and for each such investigation that has been concluded, state how it was resolved.

INTERROGATORY NO. 8:

If YOU and/or any of YOUR employees have been or are the subject of any Qui Tarn and/or Whistleblower actions with respect to BYETTA including without limitation fraud, misrepresentation (including but without limitation manipulation of any preclinical, nonclinical, animal, clinical, and/or post-clinical stud participant selection criteria, protocols, processes, data, and/or results) and/or bribery identify the Court(s) involved; identify the Docket Number of any such action(s); state the claims(s) and allegations) for each such action as you understand them; state the date on which each such action(s) were filed; describe the current status of each

such action and for each such action that has been concluded, state how it was resolved.

INTERROGATORY NO. 9:

If YOUR company has been the subject of a Corporate Integrity Agreement or is in the process of negotiating a Corporate Integrity Agreement which involves without limitation fraud, misrepresentation (including but without limitation, manipulation of any preclinical, nonclinical, animal, clinical, and/or post-clinical study participant selection criteria, protocols, processes, data, and/or results) and/or bribery, identify each Corporate Integrity Agreement; state the subject of each such Agreement; state each such Agreement's effective dates; and state the current status of each such Agreement.

REQUEST FOR PRODUCTION NO. 4:

The communications YOU have received from the FDA in the last 8 years in which the FDA refused a warning YOU proposed be added to the label of any of YOUR branded prescription drugs to address a "serious side effect" in the drug's Medication Guide because, in the FDA's view, there was no REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION between the "serious adverse event" and YOUR drug.

REQUEST FOR PRODUCTION NO. 5:

The communications YOU have received from the FDA in the last 8 years in which the FDA refused any warning YOU proposed be added to the label of any of YOUR branded prescription drugs because, in the FDA's view, there was no REASONABLE EVIDENCE OF A CAUSAL ASSOCIATION between the medical condition at issue and YOUR drug.

REQUEST FOR PRODUCTION NO. 6:

The communications YOU have received from the FDA that YOU contend demonstrate that the FDA believes there is no REASONABLE EVIDENCE OF ACAUSAL ASSOCIATION between pancreatic cancer and VICTOZA.

REQUEST FOR PRODUCTION NO. 7:

All DOCUMENTS in which the FDA instructed YOU to remove a medical condition from the Highlights, Warnings and Precautions, Adverse Reactions, Nonclinical Toxicology, Clinical Studies, Patient Counseling Information, or Medication Guide for VICTOZA.

REQUEST FOR PRODUCTION NO. 8:

The DOCUMENTS in which the FDA rejected or discussed the rejection of any warning YOU proposed be added for VICTOZA.

REQUEST FOR PRODUCTION NO. 10:

Every DOCUMENT in which an employee of, or consultant to, YOUR company recommends including a reference to pancreatic cancer in the VICTOZA Prescribing Information or Medication Guide.